

Annual CPNI Certification Pursuant to 47 C.F.R. § 64.2009(e)

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

1. Date filed: March 6, 2013
2. Name of company covered by this certification: Affiniti, LLC
3. Form 499 Filer ID: 829950
4. Name of signatory: Darol Lain
5. Title of signatory: President and CEO
6. Certification:

I, Darol Lain, certify that I am the President of the company named above, and, acting as an agent of Affiniti, LLC (the "Company"), I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI Rules. *See* 47 C.F.R. § 64.2001 *et seq.*

The Company began providing service on October 18, 2013 contemporaneously with its acquisition of a substantial portion of the assets of Trillion Partners, Inc. ("Trillion") (Form 499 Filer ID 823288). The remaining Trillion assets (those located within the State of California) were acquired by the Company on November 20, 2013. This certification therefore pertains to the period from October 18, 2013 to December 31, 2013.

Attached to this certification is a statement explaining how the Company's operating procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, which statement is incorporated by reference into this certification.

The Company has not taken any actions against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

To the extent necessary, the Company hereby seeks leave to file this certification after the March 1, 2014 deadline for submission of certifications under Section 64.2009(e) of the Commission's CPNI Rules. A waiver of the deadline is appropriate in this circumstance given the fact that the Company is in its first year of providing service and the delay in filing is *de minimis*. Neither any entity nor the public interest will be harmed by grant of the requested relief.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: _____

A handwritten signature in black ink, appearing to read 'Darol Lain', is written over a horizontal line.

Darol Lain
President and CEO
Affiniti, LLC

Attachment: Accompanying Statement explaining CPNI procedures

**Accompanying Statement to
Annual CPNI Certification Pursuant to 47 C.F.R. § 64.2009(e)**

Affiniti, LLC

Affiniti, LLC ("Affiniti") has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's regulations regarding the protection of customer proprietary network information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Affiniti provides a hosted Voice over Internet Protocol ("VoIP") service to enterprise customers (primarily school districts) under the Commission's E-rate program. Affiniti's minimal use of customer information is strictly limited to internal call routing information necessary to connect calls to and from the local exchange carrier ("Call Routing Information").

Because Affiniti only provides VoIP service to enterprise customers and Affiniti's relationship with those customers is governed by private contractual arrangements, any disclosure of CPNI to a customer is made only to customer employees that are recognized by Affiniti personnel as having authorization to access such data.

Affiniti does not share customers' CPNI within the company or with any third parties for marketing purposes.

Affiniti employees have been trained in the appropriate use of CPNI, and the company has established disciplinary procedures for violation of its CPNI policy.

If an employee becomes aware of any suspected breach of CPNI protections, he or she is instructed immediately to notify his or her supervisor, who will then be responsible, in consultation with legal counsel, for determining if Affiniti has experienced a breach and, if one has occurred, for notifying the United States Secret Service, the Federal Bureau of Investigation, and the customer in a lawful and timely manner.